

HIGH PLAINS WIRELESS

- Serving The Texas Panhandle -

CERTIFICATION OF COMPLIANCE

WITH CPNI RULES

I, Danny McWhorter, hereby certify that I am an officer of Amarillo CellTclCo¹ with the title of Vice President and General Manager; that I am authorized to execute this certification as an agent for Amarillo CellTclCo; and that based upon my personal knowledge, I certify that Amarillo CellTclCo has established operating procedures that are adequate to ensure compliance with the rules of the Federal Communications Commission set forth in 47 CFR §§ 62.2001 through 64.2009.

A statement explaining how the operating procedures of Amarillo CellTelCo ensure that it is in compliance with the rules of the FCC is attached hereto.

Danny McWhorter

Vice President and General Manager

Executed on:

¹ Amarillo CellTelCo's subsidiaries, Amarillo License, L.P. and High Plains Wireless, L.P., hold the Federal Communications Commission wireless licenses for the benefit of Amarillo CellTelCo; however, Amarillo CellTelCo is the entity that is engaged in the marketing and provision of commercial mobile wireless service, and all customer interactions are with Amarillo CellTelCo.



HIGH PLAINS WIRELESS COMMUNICATIONS - Serving The Texas Panhandle -

AMARILLO CELLTELCO

STATEMENT OF CPNI COMPLIANCE PROCEDURES

Amarillo CellTelCo maintains CPNI in the following databases and record systems: billing system, paper vision scanning system and mobile telephone switching office. Each of these systems is protected against unauthorized access by log-in and password procedures. All paper records are shredded prior to disposal.

Amarillo CellTelCo has established operating procedures whereby personnel who are authorized to access CPNI are trained in the authorized uses of this information. Pursuant to these procedures, any employee who violates the authorized procedures for access to this information is subject to discipline, up to and including termination of employment.

Amarillo CellTelCo has established operating procedures to use an opt-out method of customer consent for the use of CPNI in marketing activities. These procedures include a requirement that the company's database of opt-out approvals be checked before accessing and using the customer's CPNI for marketing in all instances where customer approval is required.

Amarillo CellTelCo has established operating procedures to maintain a record of all sales and marketing campaigns that use CPNI. Pursuant to these procedures, the records are maintained by the Marketing Manager and must be maintained for at least one year.

Amarillo CellTelCo has established operating procedures for supervisory review of all outbound marketing activities to ensure compliance with the FCC's rules governing CPNI. Pursuant to these procedures, approval of the Marketing Manager is required prior to any use of CPNI for marketing activities.

Amarillo CellTelCo has established operating procedures for account representatives and customer service representatives to access a customer's CPNI during the course of an inbound or outbound telephone conversation, solely for the duration of that conversation, upon oral authorization by the customer. Pursuant to these procedures, each account representative and customer service representative is required to inform the customer of his or her right to deny access to the CPNI before requesting this consent.